

ROBERT G. BERNHOFT, ESQ.
Wisconsin Bar No. 1032777
THE BERNHOFT LAW FIRM, S.C.
1402 E. Cesar Chavez Street
Austin, Texas 78702
(512) 582-2100 telephone
(512) 373-3159 facsimile
djtreuden@bernhofflaw.com

JOEL F. HANSEN, ESQ.
Nevada Bar No. 1876
HANSEN & HANSEN, LLC
9030 W. Cheyenne Avenue, #210
(702) 906-1300 office
(702) 366-1857: facsimile
efile@hansenlawyers.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC.,
AMERICAN TECHNOLOGY SERVICES,
COMPLIANCE CONSULTANTS,
CHROME BUILDERS CONSTRUCTION,
INC., and UNIFIED DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A. and JOHN
and JANE DOES 1-100,

Defendants.

Case No. 2:18-cv-01919-RFB-BNW

**JOINT STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
DEFENDANT'S OBJECTION TO
MAGISTRATE JUDGE'S ORDER [ECF
NO. 192]
(Sixth Request)**

Pursuant to Local Rules IA 6-1, IA 6-2, 7-1, and IB 3-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the "Plaintiffs"), and the Defendant Bank of America (hereinafter "BOFA"), by and through their respective attorneys of record, hereby jointly stipulate to extend the briefing schedule for the Plaintiffs to file a response to the Defendant's Objection to the Magistrate Judge's Order. (Docs. 192 and 200.) This is the sixth stipulation requesting an extension of time to extend the deadline to

1 respond to the Defendant's Objection. (Doc. 200.) Plaintiffs' response to Defendant's Objection was
 2 originally due November 18, 2021. Prior stipulations extended the deadline to December 1, 2021, then
 3 to December 6, 2021, then to December 15, 2021, then to December 30, 2021, and a current due date
 4 of January 11, 2022. (Docs. 211, 217, 227, 230, and 242.) This request seeks an extension to January
 5 25, 2022. In support thereof, the Plaintiffs and BOFA represent as follows:

6 This stipulation for an extension is not intended to cause undue delay. Every attorney and
 7 paralegal at the Bernhoft Law Firm save one has now fallen ill with either the flu or COVID-19 over
 8 the past two weeks, and the Firm's offices were closed last week. Attorney Bernhoft (undersigned
 9 Plaintiffs' counsel) is lead drafter on this response brief. He fell ill over the New Year's weekend and
 10 is still being treated for both flu and COVID-19. For these reasons, the Plaintiffs require an extension
 11 of time to file their response to BOFA's objections to this Court's Rule 30(b)(6) order.

12 Plaintiffs' counsel contacted BOFA's counsel and discussed extending the briefing deadline.
 13 Based on those discussions, the Parties stipulate to extend the deadline for Plaintiffs to respond to
 14 BOFA's Objection to the Magistrate Judge's Order to January 25, 2022. The Parties agree that the
 15 foregoing constitutes good cause to extend the briefing schedule deadlines.

16 **IT IS SO STIPULATED.**

17 Dated: January 10, 2022
 18 THE BERNHOFT LAW FIRM, S.C.

Dated: January 10, 2022
 SNELL & WILMER, L.L.P.

19 /s/ Robert G. Bernhoft
 20 Robert G. Bernhoft, Esq.
 21 Wisconsin Bar No. 1032777
 22 1402 E. Cesar Chavez Street
 Austin, Texas 78702

23 Attorney for Plaintiffs
 24 Appearing *pro hac vice*

/s/ Blakeley E. Griffith
 Amy F. Sorenson (NV Bar 12495)
 Blakeley E. Griffith, Esq. (NV Bar 12386)
 Holly E. Cheong (NV Bar 11936)
 3883 Howard Hughes Pkwy, Ste. 1100
 Las Vegas, Nevada 89169

Attorneys for Bank of America, N.A.

25 **IT IS SO ORDERED:**

26 

27 RICHARD F. BOULWARE, II
 28 United States District Judge

DATED this 11th day of January, 2022.

1 IT IS SO ORDERED:
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4 _____
5 UNITED STATES DISTRICT COURT JUDGE

6 Dated: _____
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Certificate of Service

I hereby certify that on January 10, 2022, I electronically filed and served the foregoing third JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO DEFENDANT’S OBJECTION TO MAGISTRATE JUDGE’S ORDER [ECF NO. 192] with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system.

/s/ Robert G. Bernhoft
Robert G. Bernhoft
Attorney for Plaintiffs